

Message

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**From:** Febbo, Carol [febbo.carol@epa.gov]  
**Sent:** 9/3/2020 3:59:21 PM  
**To:** Fleury, Lorraine [FLEURY.LORRAINE@EPA.GOV]  
**CC:** Fernandez, Cristina [Fernandez.Cristina@epa.gov]  
**Subject:** Fwd: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Hi Lorraine. The following are messages/correspondence that Cristina has been involved with beginning with a message to her from Renee McGhee of OIG.

I will be back on line later this afternoon and I will advise the RA and the ARA.

Carol

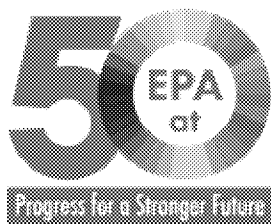
Carol A. Febbo, M.S.  
Deputy Director  
Air and Radiation Division  
U.S. EPA - Region 3  
Philadelphia, PA 19103  
Office #: 215-814-2076  
EPA Cell #: 215-375-0848

Begin forwarded message:

**From:** "Fernandez, Cristina" <Fernandez.Cristina@epa.gov>  
**Date:** September 3, 2020 at 8:37:32 AM EDT  
**To:** "Febbo, Carol" <febbo.carol@epa.gov>  
**Subject:** FW: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Here it is and I now see that I had copied you in my responses.

Cristina Fernandez, Director  
Air & Radiation Division (3AD00)  
U. S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2023  
Work: (215) 814-2178  
Cell: (215) 375-0847



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**From:** Fernandez, Cristina  
**Sent:** Tuesday, September 01, 2020 12:53 PM  
**To:** McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>  
**Cc:** Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine

<FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>

**Subject:** RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

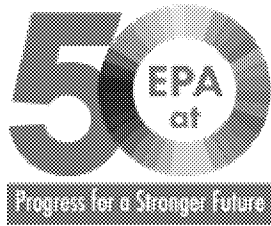
Hi Renee,

It is my understanding that our states have not, although there is interest. We have talked to our states and local agencies about doing public outreach and have offered our assistance.

We are starting to explore the option of doing public outreach using a virtual platform, but are not there yet.

Thanks, Cristina

Cristina Fernandez, Director  
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U. S. Environmental Protection Agency, Region 3  
1650 Arch Street  
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**From:** McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>

**Sent:** Tuesday, September 01, 2020 12:48 PM

**To:** Fernandez, Cristina <Fernandez.Cristina@epa.gov>

**Cc:** Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>

**Subject:** RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Cristina,

Thank you for response. Have your states or local agencies conducted public outreach to the residents living near any of the four facilities?

Kind regards,  
Renee McGhee-Lenart

*Renee McGhee-Lenart  
Acting Aider Director  
EPA Office of Inspector General  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7534*

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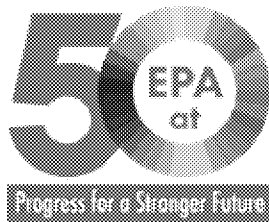
**From:** Fernandez, Cristina <Fernandez.Cristina@epa.gov>  
**Sent:** Tuesday, September 1, 2020 11:41 AM  
**To:** McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>  
**Cc:** Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Febbo, Carol <febbo.carol@epa.gov>  
**Subject:** RE: Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Hi Renee,

At this point, we have continued to work with out states and local agencies, but we have not done any public outreach.

Thanks, Cristina

Cristina Fernandez, Director  
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U. S. Environmental Protection Agency, Region 3  
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Philadelphia, PA 19103-2023  
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**From:** McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>  
**Sent:** Monday, August 31, 2020 10:59 AM  
**To:** Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Arnold, David <arnold.david@epa.gov>  
**Cc:** Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>  
**Subject:** Question Regarding the EPA OIG Ethylene Oxide Management Alert Report

Cristine,

I wanted to follow up on whether any public outreach has taken place for the residents living near the four ethylene oxide facilities in EPA Region 3.

- Nonresponsive based on revised scope
- Union Carbide Corp. – Institute Institute, WV
- Nonresponsive based on revised scope
- Union Carbide Corp. –South Charleston, WV Chemical plant

When we last communicated, no outreach had been scheduled. I understand that due to the pandemic, outreach may have been delayed.

Thank you for your assistance.

Renee McGhee-Lenart

*Renee McGhee-Lenart  
Acting Air Director  
EPA Office of Inspector General  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7534*

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**From:** Arnold, David <[arnold.david@epa.gov](mailto:arnold.david@epa.gov)>  
**Sent:** Thursday, December 19, 2019 8:58 AM  
**To:** McGhee-Lenart, Renee <[McGhee-Lenart.Renee@epa.gov](mailto:McGhee-Lenart.Renee@epa.gov)>  
**Cc:** Chow, Alice <[chow.alice@epa.gov](mailto:chow.alice@epa.gov)>; Nitsch, Chad <[Nitsch.Chad@epa.gov](mailto:Nitsch.Chad@epa.gov)>; Fleury, Lorraine <[FLEURY.LORRAINE@EPA.GOV](mailto:FLEURY.LORRAINE@EPA.GOV)>; Fernandez, Cristina <[Fernandez.Cristina@epa.gov](mailto:Fernandez.Cristina@epa.gov)>  
**Subject:** RE: EPA OIG Air Toxics RTR/Congressional Request Audit -- Updating the OIG Ethylene Oxide Management Alert Report

Hi Renee,

At this point in time, Region 3 has not scheduled meetings with city councils, scheduled door-to-doors in certain communities, or scheduled any other public meeting with residents that will take place in the next six months. As noted in the Communications Plan, this is a living document used to guide our communication efforts.

Let me know if you have any other questions.

David L. Arnold  
Deputy Director  
Air & Radiation Division  
US EPA - Region 3  
1650 Arch Street  
215-814-2172

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**From:** McGhee-Lenart, Renee  
**Sent:** Wednesday, December 18, 2019 4:26 PM  
**To:** Fernandez, Cristina <[Fernandez.Cristina@epa.gov](mailto:Fernandez.Cristina@epa.gov)>; Arnold, David <[arnold.david@epa.gov](mailto:arnold.david@epa.gov)>  
**Cc:** Chow, Alice <[chow.alice@epa.gov](mailto:chow.alice@epa.gov)>; Nitsch, Chad <[Nitsch.Chad@epa.gov](mailto:Nitsch.Chad@epa.gov)>; Fleury, Lorraine <[FLEURY.LORRAINE@EPA.GOV](mailto:FLEURY.LORRAINE@EPA.GOV)>  
**Subject:** FW: EPA OIG Air Toxics RTR/Congressional Request Audit -- Updating the OIG Ethylene Oxide Management Alert Report

Cristina,

We have a follow-up question about the Region 3 Ethylene Oxide Communication plan.

Has Region 3 scheduled any meetings with city councils, scheduled door-to-doors in certain communities, or scheduled any other public meeting with residents that will take place in the next six months?

(January to June 2020). We are revising our final report and want to include any meetings that have been scheduled.

Thank you for your help.

Renee McGhee-Lenart

*Renee McGhee-Lenart  
EPA Office of Inspector General  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 551-7534*

**PHASE II Initial Outreach/Increase Awareness**  
2020)

(January 2020 – June

- **Program actions:** Region 3 to provide assistance as needed to state and local partners as we continue to work down the remaining EtO facilities, while adding more as we find them. We expect that with information learned from Phase I, Second tier facilities should have a more in depth look to confirm that they are indeed a lower risk or determine if their risks have increased. Provide info to S/L. Bring in OAQPS if needed for technical meetings. ECAD will strategize opportunities to identify EtO non-reporters and work with S/Ls enforcement/permit groups.
- **Corresponding communications:** Continue dialog with state and local partners on how they want to inform the local communities. The message to be shared will depend on how the S/L plans to work with their facilities; how the facilities respond; and if there are some ways to reduce exposures.

Proposed actions during this phase:

- *Develop key messages most appropriate for Phase II*
- *Intergovernmental outreach*
- *City council meetings*
- *Door-to-doors (TBD)*
- *Program activities will drive communications activities; TBD based on Phase 1.*

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**From:** Fernandez, Cristina <[Fernandez.Cristina@epa.gov](mailto:Fernandez.Cristina@epa.gov)>

**Sent:** Monday, August 12, 2019 11:41 AM

**To:** McGhee-Lenart, Renee <[McGhee-Lenart.Renee@epa.gov](mailto:McGhee-Lenart.Renee@epa.gov)>

**Cc:** Chow, Alice <[chow.alice@epa.gov](mailto:chow.alice@epa.gov)>; Nitsch, Chad <[Nitsch.Chad@epa.gov](mailto:Nitsch.Chad@epa.gov)>; Fleury, Lorraine <[FLEURY.LORRAINE@EPA.GOV](mailto:FLEURY.LORRAINE@EPA.GOV)>; Chuong, Bao <[Chuong.Bao@epa.gov](mailto:Chuong.Bao@epa.gov)>

**Subject:** RE: EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th

Attached please find our response to your request.

Please, let me know if you have any questions.

Thanks, Cristina

Cristina Fernandez, Director

Air & Radiation Division (3AD00)  
U. S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2023  
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Cell: (215) 375-0847

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**From:** McGhee-Lenart, Renee <McGhee-Lenart.Renee@epa.gov>  
**Sent:** Sunday, August 04, 2019 5:35 PM  
**To:** Fernandez, Cristina <Fernandez.Cristina@epa.gov>  
**Cc:** Chow, Alice <chow.alice@epa.gov>; Nitsch, Chad <Nitsch.Chad@epa.gov>; Fleury, Lorraine <FLEURY.LORRAINE@EPA.GOV>; Chuong, Bao <Chuong.Bao@epa.gov>  
**Subject:** EPA OIG Air Toxics RTR/Congressional Request Audit -- Request for Information by August 12th

Cristina,

As you may be aware, EPA-OIG is currently conducting an audit of the agency's air toxics Risk and Technology Review (RTR) process. The notification memo is attached. We have expanded our scope to address recent Congressional requests related to ethylene oxide emissions and risk communication. We understand that the following facilities in Region 3 contribute to elevated cancer risks at the census tract and/or census block level based on modeling conducted by the Office of Air Quality Planning and Standards (OAQPS) to develop the 2014 NATA:

- Nonresponsive based on revised scope
- Union Carbide Corp. – South Charleston Facility (South Charleston, WV)
- Union Carbide Corp. – Institute (Institute, WV)
- Nonresponsive based on revised scope

As part of our audit, please provide the following by COB August 12, 2019:

- Any communications plan drafted or finalized as of August 2, 2019 to communicate to the public in Region 3 about elevated cancer risks from ethylene oxide emissions, and
- A response to the following questions:
  - <!--[if !supportLists]--><!--[endif]-->Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., public meetings, webinars, etc.) has Region 3 conducted to inform residents about the elevated cancer risks as a result of ethylene oxide emissions from the above four facilities? If so, please provide the:
    - <!--[if !supportLists]--><!--[endif]-->type of outreach (e.g., public meetings, webinars, etc.) conducted for these residents,
    - <!--[if !supportLists]--><!--[endif]-->date of each outreach,
    - <!--[if !supportLists]--><!--[endif]-->location of each outreach if applicable, and
    - <!--[if !supportLists]--><!--[endif]-->outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).
  - Since the release of the 2014 NATA to the public on August 22, 2018, what outreach (e.g., face-to-face meeting, conference call, etc.) has Region 3 conducted to inform elected officials about the elevated cancer risk of their constituents as a result of ethylene oxide emissions from the above four facilities? If so, please provide the:
    - type of outreach (e.g., face-to-face meeting, conference call, etc.) conducted for these elected officials,
    - date of each outreach,

- location of each outreach if applicable, and
- outreach documentation (e.g., sign-in sheets, meeting agenda, briefing materials, etc.).

If there are additional facilities contributing to elevated cancer risks that Region 3 has independently modeled or modeled with assistance from OAQPS, please also provide the name and location of the facilities and information on any outreach (i.e., type of outreach, date of each outreach, location of outreach if applicable, and outreach documentation) conducted by Region 3 for residents and elected officials by COB August 12, 2019.

Thank you for your assistance. Please let me know if you have any questions.

Renee McGhee-Lenart

*Renee McGhee-Lenart  
EPA Office of Inspector General  
11201 Renner Blvd.  
Lenexa, KS 66219  
(913) 661-7534*